



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Nick Fish, Commissioner ■ Michael Jordan, Director

September 30, 2015

Alex Liverman  
Oregon Department of Environmental Quality  
Northwest Region Cleanup Program  
700 NE Multnomah St., Suite #600  
Portland, OR 97232

Subject: Source Control Measures Effectiveness Demonstration

Dear Alex:

Early last year the City submitted a Closure Report for the City of Portland Outfalls Project, as an attachment to the Municipal Stormwater Source Control Report (BES, December 2013). Following DEQ review of the Closure Report, DEQ and the City met to discuss final steps for the closure of the Intergovernmental Agreement (IGA) DEQ No. LQVC-NWR-03-10, under which DEQ and the City utilized their joint authorities to identify contaminant sources to municipal stormwater conveyance systems in the harbor and to refer them to appropriate programs for control. To provide stronger support for the City's conclusions in the Closure Report, DEQ requested that the City provide additional documentation to demonstrate the effectiveness of the source control measures that the City implemented in City outfall basins under the IGA.

Over the last six months, the City worked with DEQ to develop an approach to demonstrating effectiveness. The enclosed Source Control Measures Effectiveness Demonstration report is intended to accomplish two main objectives:

1. Demonstrate how source control measure effectiveness is being demonstrated in City outfall basins where measures were implemented to meet Portland Harbor goals.
2. Use a standard approach to identify City outfall basins where additional monitoring by the City is warranted in order to demonstrate source control measure effectiveness.

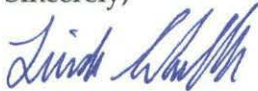
In addition, the report includes a qualitative and quantitative weight-of-evidence for each outfall basin that supports the Closure Report conclusion that City outfalls are not a significant future pathway for contaminants to reach the river from upland areas (i.e., recontamination potential will be low once identified sources have been controlled). The report is intended to complement the Outfall Basin Completion Summaries included in the Closure Report, and the myriad of programmatic and basin-specific reports submitted under the IGA.

As an outcome from this effectiveness evaluation, the City identified one basin for which additional City monitoring is needed at this time, and appended a proposed Sampling and Analysis Plan (SAP) to the report. The City and DEQ have agreed that DEQ approval of the

Effectiveness Demonstration and proposed SAP will trigger issuance of the forthcoming Source Control Decision for the City Outfalls project and Notice of Completion for the IGA.

Due to the influence of river elevation on the availability of the proposed monitoring location, the City would like to implement the SAP immediately upon DEQ approval. Once you have had the opportunity to review the enclosed report, please contact me at (503) 823-2296 if you have any questions or need more information, and thank you for your assistance and feedback on the approach utilized in the report.

Sincerely,



Linda Scheffler  
Water Resources Program Manager

Enc.: Source Control Measures Effectiveness Demonstration (2 copies)

Cc: **Eva DeMaria, EPA**  
Sean Sheldrake, EPA (CD copy only)  
Kristine Koch, EPA (CD copy only)  
Kim Cox, City of Portland, BES (CD copy only)  
Karen Moynahan, City of Portland, Office of the City Attorney (CD copy only)  
Karen Demsey, GSI Water Solutions